



1 as a four-part series you were employed by Anthem  
2 Wrestling?

3 MR. MILLER: Objection to form.

4 THE WITNESS: Yes.

5 BY MR. LEE:

6 Q. Going back to paragraph 112. At the end it  
7 says: Likely to cause confusion. Are you aware of  
8 any actual confusion by any customers with respect  
9 to what the alleged Anthem improper use of the  
10 Global Force Wrestling or GFW marks?

11 A. Can you clarify the question? I want to make  
12 sure. Am I aware --

13 Q. Are you aware of any actual confusion by  
14 consumers or customers of Anthem Wrestling's  
15 allegedly improper use of the Global Force Wrestling  
16 or GFW marks?

17 A. Yes.

18 Q. Tell me, what is it?

19 A. From the time that we split through generally  
20 most of 2018, the wrestling fans continued to ask  
21 questions in general like are you a part of Impact?  
22 Did you leave Global Force and Impact? Does Impact  
23 own GFW? Does GFW own Impact? Just general  
24 confusion in the marketplace on where things stood.

25 Q. Similar to kind of that newspaper article we

1 looked at earlier from June of 2017, where even in  
2 that article there was the Tennessean article where  
3 he's talking about GFW where, again, it's not --  
4 even the author of that article wasn't necessarily  
5 accurately kind of stating things there? It's that  
6 type of confusion? It's similar to that type of  
7 confusion?

8 MR. MILLER: Objection to form.

9 THE WITNESS: I don't -- I -- I would --  
10 I would not classify them exclusively in the same  
11 category.

12 BY MR. LEE:

13 Q. Okay. So after the split through 2018, when  
14 the wrestling fans would have this type of  
15 confusion, how was that conveyed to you? Who was  
16 that conveyed to, to you individually or to Global  
17 Force Entertainment?

18 A. Both.

19 Q. How did they convey that confusion to you?

20 A. To me personally, at events, conventions,  
21 wrestling shows, wrestling events. And then on --  
22 through social media.

23 Q. Do you have -- so what social media accounts  
24 does Global Force Entertainment have?

25 A. Instagram, YouTube, Twitter, Facebook.

1 times. The Tag Team Title. The European Title.

2 That's it.

3 Q. Did you wrestle at WrestleMania during your  
4 time with WWE?

5 A. Yes.

6 Q. Did you wrestle at WrestleMania XI?

7 A. Yes.

8 Q. And that would be --

9 A. XI.

10 Q. -- XI, yeah. Wrestled at WrestleMania XI  
11 against Razor Ramon?

12 A. Yes.

13 Q. Razor Ramon. And did you wrestle in  
14 WrestleMania XV?

15 A. XIII.

16 Q. XIII. You didn't wrestle in XI or XV as  
17 well?

18 A. You're going to get me confused.

19 Q. How many WrestleManias do you recall  
20 wrestling at?

21 A. X, XI. In Hartford. Philly. I'm trying to  
22 think of the other ones. Several.

23 Q. So several. Were those WrestleManias  
24 broadcast?

25 A. Yes.

1 Q. Were they recorded and now sold on DVD  
2 format?

3 A. Yes.

4 Q. Do they continue to be hold by the WWE on DVD  
5 format?

6 A. Yes.

7 Q. During your time with the WWF, which is now  
8 the WWE, did you appear on numerous pay-per-view  
9 events and televised wrestling matches?

10 A. Yes.

11 Q. Were many of those recorded by the WWE?

12 A. All of them.

13 Q. Are any -- to your knowledge are any of them  
14 still available for streaming on WWE service or  
15 through purchasing from the WWE?

16 A. Yes.

17 Q. Who, if anyone, is Bob Holly?

18 A. Real name Bob Howard from Southern Alabama.  
19 I started working with Bob in the late '80s. His  
20 professional name/persona became Sparky, Spark Plug  
21 Bob Holly, and then later just Bob Holly.

22 Q. Did you wrestle Bob Holly for the  
23 Intercontinental Title in April of 1995?

24 A. Yes.

25 Q. Who, if anyone, is Cactus Jack?

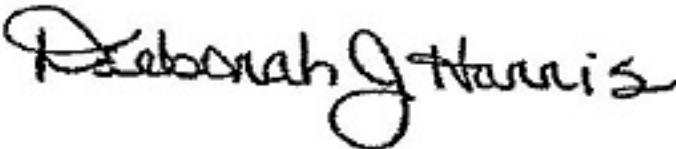
1 REPORTER'S CERTIFICATE

2

3 I, Deborah Harris Honeycutt, LCR, Notary  
4 Public and Court Reporter, do hereby certify that I  
5 recorded to the best of my skill and ability by  
6 machine shorthand all the proceedings in the  
7 foregoing transcript, and that said transcript is a  
8 true, accurate, and complete transcript to the best  
9 of my ability.

10 I further certify that I am not an  
11 attorney or counsel of any of the parties, nor a  
12 relative or employee of any attorney or counsel  
13 connected with the action, nor financially  
14 interested in the action.

15 SIGNED this 2nd day of December, 2019.

16   
17  
18

19 Deborah Harris Honeycutt, LCR

20

21 My Notary commission expires: 5/05/2020

22 Tennessee LCR No. 472  
23 Expires: 6/30/2020

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